

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C.**

In the Matter of	)	
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Numbering Resource Optimization	)	Docket No. 99-200
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**COMMENTS OF THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

The Public Service Commission of the State of Missouri (“MoPSC”) offers the following comments in response to the Federal Communication Commission’s (“Commission”) October 17, 2001 Public Notice issued in the above docketed case. The Commission seeks comment on the proposed national thousands-block number pooling rollout schedule.

In the *Numbering Resource Optimization First Report and Order*, The Commission determined that implementation of thousands-block pooling is essential to extending the life of the North American Numbering Plan (NANP) by making the assignment and use of NXX codes more efficient.<sup>1</sup> On August 14, 2001, Neustar, the National Pooling Administrator filed with the Commission its “Thousands Block Number Pooling Detailed Rollout Plan – 09/24/01” (Plan). The rollout schedule is divided into three-month segments, or quarters. Starting in March 2002, number pools will be established in approximately 21 numbering plan areas (NPA) each quarter.

On July 20, 2000 and March 14, 2001, the Commission gave the MoPSC delegated authority to implement state pooling trials in the 314 and 816 NPAs.<sup>2</sup> On September 25, 2001, the MoPSC

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<sup>1</sup> *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC red 7574, 7625, para. 122 (rel. Mar. 31, 2000) (*First Report and Order*).

<sup>2</sup> *Numbering Resource Optimization*, Order, July 20, 2000 and March 14, 2001.

exercised its authority by ordering state pooling trials in the 314 NPA and the 816 NPA in January and February, 2002, respectively.<sup>3</sup>

On October 24, 2000, the MoPSC adopted an all services distributed overlay as the method of relief for the 314 and 816 NPA.<sup>4</sup> Simultaneously with the rollout of the 314 and 816 NPA, Neustar proposes to rollout the 557 and 975 overlay NPAs. Due to the continued success of area code conservation efforts in Missouri, the MoPSC was able to delay implementation of the 314 and 816 NPA overlay relief plans indefinitely subject to the continuous monitoring of code usage and assignment rates in these areas.<sup>5</sup>

In its Public Notice, the Commission stated, “Pooling trials that have commenced before March 2002 will be transitioned into the national pooling administration program prior to the national pooling rollout.”<sup>6</sup> Therefore, the MoPSC respectively advises the Commission that the 314/557 NPAs, included in the first quarter schedule and the 816/975 NPAs, included in the fourth quarter schedule, no longer need to be included in the Plan provided that the state pooling trials are implemented without any obstructions and are subsequently transitioned into the national pooling administration program prior to the national pooling rollout.

In addition to these changes, the MoPSC requests the following NPA substitutions to the Plan as proposed:

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<sup>3</sup> *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Case No. TO-2000-374, Order Directing State Number Pooling Trials, September 25, 2001.

<sup>4</sup> *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Case No. TO-2000-374, Report and Order, October 24, 2000.

<sup>5</sup> *In the Matter of the Petition of the North American Numbering Plan Administrator, on Behalf of the Missouri Telecommunications Industry, for Approval of NPA Relief Plan for the 314 and 816 Area Codes*, Case No. TO-2000-374, Order Delaying Implementation of the 314 NPA and 816 NPA Overlay Relief Plans and Dismissing a Party, September 25, 2001.

NPA	Region	MSA	Proposed Rollout Date	Projected Exhaust Date	Remaining Codes	Substituted Rollout Date
573	SW	St. Louis, MO	4 <sup>th</sup> quarter	1Q2008	334	1 <sup>st</sup> quarter
417	SW	Springfield, MO	7 <sup>th</sup> quarter	3Q2008	370	2 <sup>nd</sup> quarter
636	SW	St. Louis, MO	3 <sup>rd</sup> quarter	1Q2008	487	Same (3 <sup>rd</sup> Q)
660	SW	Kansas City, MO	2 <sup>nd</sup> quarter	4Q2021	465	7 <sup>th</sup> quarter

In order to propose the substituted rollout dates, the MoPSC considered the monthly code usage, the projected exhaust date and the remaining codes for each NPA. Even though the 417 NPA is not in the top 100 Metropolitan Statistical Areas (MSAs), the NPA includes one of the fastest growing areas within the state and therefore has the potential of utilizing available codes at a much greater pace than the more sparsely populated areas of the 660 NPA in the Kansas City MSA. In addition, because of fast growth in the 417 NPA, it is anticipated that the 417 NPA will utilize codes faster than the 636 NPA, which is still in its infancy. Utilization in the 636 NPA, especially by the wireless carriers, is not anticipated to be as prominent as in areas such as the 314, 816 and 417 NPAs.

The MoPSC's suggested changes and substitutes will free up two slots in the fourth quarter which could be used to accommodate additional scheduling petitions from states outside the top 100 MSAs that believe pooling would be beneficial in an NPA within their state.

Having reviewed the Plan for Missouri-specific rollout schedules and making the above request for substitutions, the MoPSC would now like to express its concerns with the Plan, whether approved as proposed by Neustar or as proposed by the MoPSC. As the Commission is aware, only those carriers that have implemented permanent local number portability (LNP) have the capability to participate in thousands-block pooling. According to 47 C.F.R. §52.23(b)-(c), "All LECs must provide a long-term database method for number portability in the 100 largest Metropolitan Statistical Areas (MSAs) by December 31, 1998, in accordance with the deployment schedule set forth in the Appendix to this part,

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<sup>6</sup> "The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout

in switches for which another carrier has made a specific request for the provision of number portability...” The Commission further stated, “At the present time, we do not grant the state commissions the authority to require a carrier to acquire LNP solely for the purpose of being able to participate in a thousands-block pooling trial. Wireline carriers outside the top 100 Metropolitan Statistical Areas (MSAs) are only required to implement LNP if requested by another carrier subject to the requirements established by the FCC [47 C.F.R. § 52.23 (b)-(c)]. Within areas that are subject to a pooling trial, non-LNP carriers shall continue to be able to obtain full NXX codes.”<sup>7</sup> All Missouri NPAs have been designated as within the top 100 MSAs with the exception of the 417 NPA. Yet, most carriers in the 573, 636, 417 and 660 NPAs are not LNP capable because they have not received a “bonafide” request from another carrier. The MoPSC urges the Commission to revisit the LNP requirements for the purpose of participating in thousands-block pooling prior to the initial rollout of the Plan.

Finally, once the Solicitation for a National Pooling Administrator was released, the communication line between the Commission and the states severely diminished. While the MoPSC understands the confidentiality requirements surrounding a Solicitation and the resulting contract award, it would encourage the Commission to reinstate the same communication standards as were present prior to the Solicitation. The Commission and the states have made great progress in addressing national number shortages. As we broach the next milestone in area code conservation, it is vital that the communication lines remain open.

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Schedule”, Public Notice, CC Docket 99-200, October 17, 2001.

<sup>7</sup> *Numbering Resource Optimization*, Order, July 20, 2000

Respectfully submitted,

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